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9
10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA
12 SAN FRANCISCO DIVISION

13 UNILOC USA, INC. and
UNILOC LUXEMBOURG, S.A.,

14 Plaintiffs,

15 v.

16 APPLE INC.,

17 Defendant.

Case No.: 3:18-cv-00358-WHA

**CIVIL L.R. 79-5(E) DECLARATION OF
AARON S. JACOBS REGARDING
DEFENDANT APPLE INC.'S
ADMINISTRATIVE MOTION TO SEAL
PORTIONS OF ITS OPPOSITION TO
UNILOC'S RENEWED MOTION FOR
ORDER (1) ADDING UNILOC 2017 AS A
PARTY AND (2) DECLARING THIS
COURT HAS SUBJECT MATTER
JURISDICTION AND EXHIBITS C AND
D THERETO (DKT. NO. 162)**

1 I, Aaron S. Jacobs, hereby declare as follows:

2 1. I am counsel for Plaintiffs Uniloc USA, Inc., and Uniloc Luxembourg, S.A.,
3 (collectively “Uniloc”).

4 2. On Thursday, October 22, 2020, at Docket Number 162, Defendant Apple Inc.
5 (“Apple”) filed an administrative motion to seal the **Memorandum** (at 8:20-24) and **Exhibits C** and
6 **D** accompanying Apple’s opposition to Uniloc’s renewed motion to add Uniloc 2017 LLC as a party
7 and declare that this Court has subject-matter jurisdiction.

8 3. I reviewed those materials in coordination with counsel for third-party Fortress Credit
9 Co. LLC and Fortress Investment Group LLC (collectively “Fortress”). In light of this Court’s prior
10 orders regarding the parties’ efforts to seal certain of this and similar information, Uniloc believes
11 that the information that Apple proposes to seal or redact associated with Docket No. 162 may be
12 submitted onto the public record.

13 4. For the foregoing reasons, Uniloc therefore does not ask that the proposed
14 information be sealed or redacted, and so Apple’s administrative motion to seal Uniloc and
15 Fortress’s information, Dkt. No. 162, may be denied.

16 Date: October 30, 2020

Respectfully submitted,

17 /s/ Aaron S. Jacobs

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